

**APPENDIX D**  
**LETTER FROM ARB CONCERNING CO ANALYSIS**

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(posted on MTC Website ([www.mtc.ca.gov](http://www.mtc.ca.gov)) 2-14-02)



Winston H. Hickox  
Agency Secretary

# Air Resources Board

Alan C. Lloyd, Ph.D.  
Chairman

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Gray Davis  
Governor

February 14, 2002

Mr. Chris Brittle  
Planning Manager  
Metropolitan Transportation Commission  
Joseph P. Bort Metrocenter  
101 Eighth Street  
Oakland, California 94607-4700

Dear <sup>Chris</sup>Mr. Brittle:

This letter provides the information you requested to further support the carbon monoxide (CO) transportation conformity analysis in the Metropolitan Transportation Commission's (MTC) 2001 Regional Transportation Plan (RTP).

The Bay Area has continuously attained the federal CO standard since 1993. The applicable emissions budget for CO in Bay Area was based on established in the 1996 Carbon Monoxide Redesignation Request and Maintenance Plan for Ten Federal Areas and a 1998 Revision to that plan. The applicable year of analysis for conformity is 2010, which is the last year of the Maintenance Plan. This approved CO budget was developed using EMFAC7F v1.1, which must also be used for conformity analysis against this budget. The EMFAC7F model relies on "hard coded" fleet mix and age distribution data programmed during model development in the early 1990s. Updated fleet mix and age data for the Bay Area are not available. However, these data are not needed given the region's long-standing attainment status and the continuing downward trend in CO emissions.

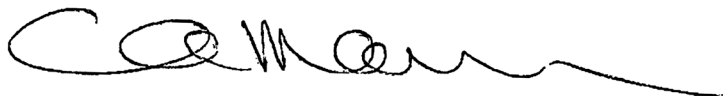
Nonetheless, we can gain a sense of how more recent vehicle fleet and age data would impact CO emissions in the Bay Area through an informal assessment. The SF Bay Area-EMFAC2000 model used to develop the Bay Area's 2001 Ozone State Implementation Plan (SIP), and its associated ozone budgets, incorporates 1998 fleet mix and age distribution data. In December 2001, the U.S. Environmental Protection Agency (U.S. EPA) approved use of the SF Bay Area EMFAC2000 model, specifically for the 2001 Ozone SIP and related conformity analyses. While this model cannot be used for CO conformity analyses, its output illustrates that considerable changes in emissions due to updated fleet mix or age distribution could be accommodated by the current CO budget (see table below). The large margin between the CO maintenance budget for the Bay Area and projected 2010 emissions results from turnover to an ever cleaner vehicle fleet; the benefits of turnover overwhelm even the combined the impacts of travel growth, fleet mix, and age distribution.

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	Bay Area CO Emissions from On-Road Vehicles (tons per day, winter season, 2010)
SF Bay Area EMFAC2000 output	1,326
Applicable emissions budget	2,193

If you have any questions, please call me at (916) 322-7236 or Mr. Douglas Ito of my staff at (916) 327-2929.

Sincerely,



Ms. Cynthia Marvin, Chief  
Air Quality and Transportation Planning Branch

cc: Mr. Tom Perardi  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, California 94109